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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE APPLICATION OF HUGH DICKSON
AND JOHN ROYLE PURSUANT TO 28
U.S.C. § 1782 FOR DISCOVERY IN AID OF
FOREIGN PROCEEDINGS,

Civil Action No.: _____

**APPLICANTS HUGH DICKSON AND JOHN ROYLE'S *EX PARTE* APPLICATION FOR
AN ORDER PURSUANT TO 28 U.S.C. § 1782 TO TAKE DISCOVERY IN AID OF A
FOREIGN PROCEEDING**

Applicants Hugh Dickson and John Royle (the "Receivers") by and through their counsel, Zeichner Ellman & Krause LLP, hereby apply for an order of judicial assistance, pursuant to 28 U.S.C. § 1782, appointing Stuart A. Krause, Esq., as a Commissioner of the Court to facilitate the issuance of subpoenas and the gathering of documentary evidence from Chelsea Associates LLC, CohnReznick LLP, Marcum LLP, RECAP Chelsea Investment, LLC and Albanese Organization Inc. for discovery to be used in a legal proceeding in the Cayman Islands, and state as follows:

The requested relief is for the purpose of obtaining limited, but important, discovery for use in connection with a foreign proceeding – an ongoing litigation in the Cayman Islands, in

which the applicants are court appointed receivers. The grounds for this Application are set forth in the accompanying Memorandum of Law in Support of Application for Judicial Assistance Pursuant to 28 U.S.C. § 1782 and the Declarations of John Royle and Adrian Mackay.

Dated: New York, New York

January 27, 2020

ZEICHNER ELLMAN & KRAUSE LLP

By: 

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